JOINT SUPPLEMENTAL REPLY DECLARATION OF PAUL A. LACOUTURE AND VIRGINIA P. RUESTERHOLZ

ATTACHMENT AA

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February 21, 2001

Mary L. Cottrell, Secretary
Department of Telecommunications & Energy
Commonwealth of Massachusetts
One South Station, 2nd Floor
Boston, Massachusetts 02110

RE: D.T.E. 99-271

Dear Ms. Cottrell:

Enclosed for filing in the above-captioned matter, please find a copy of Verizon Massachusetts' response to the Department's Question regarding Verizon's recent Performance Assurance Plan ("PAP") filing.

Thank you for your assistance to this matter.

Very truly yours.

Barbara Anne Sousa

Enclosure

cc: Cathy Carpino, Esquire, Hearing Officer (2)
Robert J. Howley, Hearing Officer
Michael Isenberg, Esquire, Director - Telecommunications Division
Attached Service List

NEW ENGLAND TELEPHONE AND TELEGRAPH COMPANY

COMMONWEALTH OF MASSACHUSETTS

D.T.E. 99-271

REQUEST: Department of Telecommunications and Energy

DATED: February 16, 2000

ITEM: DTE 1 Please explain whether there was any decrease in the amount of bill credits for the Mode of Entry ("MOE") category between the New York PAP in effect and the revised PAP filed with the New York Public Service Commission on December 22, 2000.

Please explain the reason(s) for the decrease in bill credits for the MOE category in the January 30, 2001 revised Massachusetts PAP.

REPLY: There was no change in the amount of possible bill credits for the Mode of Entry category between the NY PAP in effect and the revised PAP filed with the NY PSC on December 22, 2000. However, when the NY PAP was filed on December 22, 2000 the EDI Special Provisions were made permanent, the original $24 million in possible bill credits for EDI was reduced to $18 million and the resulting $6 million was moved to Critical Measures.
As shown on Attachment 1, the Massachusetts PAP filed on September 15, 2000 used the same percentage distribution as the then current NY PAP. However, at the time of that filing the EDI Special Provisions were temporary and therefore not included in the Massachusetts PAP In addition, the Department ordered a specific amount ($5.28 million) for the CCAP, in addition to the $142 million cap.
The MA PAP filed on January 30, 2001 included the EDI Special Provisions, the CCAP as ordered by the Department, an increase in the total potential bill credits to $155 million to equate to New York and a redistribution within the categories so that Verizon MA's revised PAP provides for exactly the same percentage of dollars at risk for each measurement category as the revised New York PAP. As shown on Attachment 2, the redistribution of possible bill credits in the Massachusetts filing necessary to be equivalent to the revised New York PAP resulted in a decrease of the MOE possible bill credits from

REPLY: DTE 1 (cont'd)

$41.20M to $39.68M or from 29.01% to 25.60% of the total. At the same time, $9.52M, representing 6.14% of the total, was allocated to the new category, EDI Special Provisions.

NET # 829

Comparison of NY Initial Plan with MA Compliance of Sept. 15, 2000				
	Initial NY Plan ($M)	% of Total Excluding CCAP	MA Plan filed 9/15/2000 ($M)	% of Total
Mode of Entry	75.00	**28.96%**	41.20	**29.01%**
Doubling of MOE	75.00	**28.96%**	41.20	**29.01%**
Critical Measures	75.00	**28.96%**	41.20	**29.01%**
Special Provisions				
Flow Through	10.00	**3.86%**	5.40	**3.80%**
Hot Cut Performance	24.00	**9.27%**	13.00	**9.15%**
EDI Special Provisions	0.00	**0.00%**	0.00	**0.00%**
Subtotal	259.00	**100.00%**	142.00	**100.00%**
CCAP	10.00		5.28	
Total	269.00		147.28	

Comparison of Most Recent NY and MA PAPs

	NY Plan filed 12/22/2000 ($M)	% of Total	MA Plan filed 1/30/2001 ($M)	% of Total
Mode of Entry	75.00	**25.60%**	39.68	**25.60%**
Doubling of MOE	75.00	**25.60%**	39.68	**25.60%**
Critical Measures	81.00	**27.65%**	42.85	**27.65%**
Special Provisions				
Flow Through	10.00	**3.41%**	5.29	**3.41%**
Hot Cut Performance	24.00	**8.19%**	12.70	**8.19%**
EDI Special Provisions	18.00	**6.14%**	9.52	**6.14%**
CCAP	10.00	**3.41%**	5.28	**3.41%**
Total	293.00	**100.00%**	155.00	**100.00%**
		Total as % of ARMIS		Total as % of ARMIS
ARMIS Net Revenue	743.871	39.39%	393.943	39.35%
	(ARMIS Report 4301, Table 1, for Jan-Dec 1998)		(ARMIS Report 4301, Table 1, for Jan-Dec 1999)	

Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, DC 20554

In the Matter of	)	
	)	
Application by Verizon New England	)	
Inc., Bell Atlantic Communications,	)	
Inc. (d/b/a Verizon Long Distance),	)	CC Docket No. 01-9
NYNEX Long Distance Company	)	
(d/b/a Verizon Enterprise Solutions),	)	
and Verizon Global Networks Inc., for	)	
Authorization To Provide In-Region,	)	
InterLATA Services in Massachusetts	)	

JOINT SUPPLEMENTAL REPLY DECLARATION OF KATHLEEN McLEAN AND RAYMOND WIERZBICKI

1. My name is Kathleen McLean. On September 22, 2000, I submitted a Declaration jointly with Raymond Wierzbicki as part of Verizon New England Inc.'s ("Verizon's") initial Application to provide in-region interLATA services in Massachusetts. My qualifications are set forth in that Declaration.

2. My name is Raymond Wierzbicki. On September 22, 2000, I submitted a Declaration jointly with Kathleen McLean as part of Verizon's initial Application to provide in-region interLATA services in Massachusetts. My qualifications are set forth in that Declaration.

Purpose

3. The purpose of our Declaration is to address certain inaccurate or misleading statements relating to Verizon's operations support systems ("OSS") contained in the Comments and supporting Declarations filed in this proceeding by two of the commenters. None of their claims demonstrates that Verizon's OSS fail to provide

non-discriminatory service to CLECs or that Verizon has failed to meet the requirements of the 1996 Act.

Verizon's OSS Interfaces Are Operational and Handling Commercial Volumes

4. As noted in our initial and reply Declarations, Verizon provides electronic interfaces that give CLECs access to Verizon's OSS for each of the key functions – pre-ordering, ordering, provisioning, maintenance and repair, and billing. Those interfaces are fully operational, and Verizon is already handling significant commercial volumes. See McLean/Wierzbicki Decl. ¶ 34; McLean/Wierzbicki Rep. Decl. ¶ 4. Indeed, the ordering and pre-ordering volumes have continued to grow. In New York and New England (including Massachusetts), Verizon processed more than 570,000 ordering transactions in December (67,000 in Massachusetts) and more than 609,000 ordering transactions in January (76,000 in Massachusetts). Moreover, monthly pre-order transactions exceeded 1,127,000 in December (183,000 in Massachusetts) and 1,613,000 in January (220,000 in Massachusetts).

5. WorldCom continues to claim that Verizon has little commercial experience with its OSS in Massachusetts. This claim is based solely on the number of UNE-platform orders Verizon had processed at the time of Verizon's initial filing and the number of those orders submitted over the Electronic Data Interchange ("EDI") interface. WorldCom Br. at 28-29. See also ASCENT at 16-17 (parroting WorldCom's claims). As shown by the above number of transactions processed, Verizon has substantial commercial experience with its OSS in Massachusetts, including thousands of UNE-P orders each month. Indeed, competition in Massachusetts was ahead of competition in New York at the time Verizon filed its application there, both overall and in every category, except UNE-platforms. See Supp. Rep. Br. Att. A. Therefore, on a

proportional basis, Verizon's OSS have handled orders for more products in Massachusetts than they had in New York at the time of the 271 application there.

6. As we noted in our prior declarations, Verizon's OSS interfaces and systems in Massachusetts, including their ability to handle UNE-P orders, were thoroughly tested by KPMG and Verizon passed that test with flying colors. See McLean/Wierzbicki Decl. ¶¶ 9-17; McLean/Wierzbicki Rep. Decl. ¶¶ 11-24. Moreover, we explained that the EDI interface Verizon offers in Massachusetts is identical to the one offered in New York. See McLean/Wierzbicki Decl. ¶¶ 21-24; McLean/Wierzbicki Rep. Decl. ¶¶ 8-10 & Att. A. PricewaterhouseCoopers ("PwC") recently confirmed that the OSS Verizon offers for line sharing – including the EDI interface – are the same in Massachusetts and New York. See Sapienza/Mulcahy Supp. Decl. ¶ 30 & Att. B. Because there is no separate EDI interface for line sharing orders, PwC's analysis confirms that Verizon offers CLECs in Massachusetts and New York access to the same EDI interface for UNE-P ordering. Volumes in New York demonstrate beyond doubt that Verizon's EDI interface is capable of handling commercial volumes of UNE-P orders.

Web GUI Interface Availability

7. WorldCom and ASCENT continue to complain that the Web GUI is unavailable too often. See Lichtenberg/Chapman Decl. ¶ 16; ASCENT at 19. As we explained previously, both commenters base their claims on outages of the underlying OSS that were scheduled and announced to the CLECs as well as outages of the Web GUI itself. See McLean/Wierzbicki Rep. Decl. ¶ 25. However, when the underlying OSS is out of service, either for scheduled downtime or an unscheduled outage, it is

equally unavailable to CLECs and to Verizon representatives. See McLean/Wierzbicki Decl. ¶ 30.

8. Further, following changes Verizon made in May and June to the Web GUI, interface availability (PO-2-02 OSS Interf. Avail. – Prime Time – Pre-Order/Order Web GUI) has consistently been high. See id. ¶ 32. Verizon's reported interface availability for the Web GUI from July through November met the 99.5 percent benchmark in four out of those five months. Specifically, during those months the reported interface availability was 99.93%, 99.24%, 99.61%, 99.75%, and 99.82%. Although Web GUI availability dropped in December, to 98.56%, this was due in large part to the decision of some CLECs to use "robots" to enter their year-end transactions into the Web GUI. As we have explained previously, the Web GUI was designed for use by humans and the use of robots degrades the interface performance for all CLECs. See id. ¶ 32. Verizon has previously explained to CLECs that use of robots violates the proper system usage of the Web GUI and requested that they cease using robots. See id. In January, Web GUI availability rose to 99.2%. Enhancements to the Web GUI that allow for improved detection and defense against inappropriate CLEC behavior, such as robots, were implemented in phases from January through mid-February.

Missing Notifiers

9. WorldCom continues to claim that Verizon has a persistent problem with missing notifiers in New York and Pennsylania. See WorldCom Br. at 31-32; Lichtenberg/Chapman Decl. ¶¶ 3-11. We have addressed this complaint previously and shown that there is not a persistent problem with missing notifiers in New York, Pennsylvania, or elsewhere. See McLean/Wierzbicki Decl. ¶¶ 63-67; McLean/Wierzbicki Rep. Decl. ¶ 38.

10. Verizon has a PON Exception trouble ticket process. Under this process, a CLEC notifies Verizon that it has not received electronic notifiers that it expected. The electronic notifiers are: acknowledgement of receipt ("ACK"), local service confirmation ("LSC") or query ("SEM"), provisioning completion notice ("PCN"), and billing completion notice ("BCN"). When a CLEC reports a missing notifier on a trouble ticket, Verizon provides the CLEC with the status of the PONs within three business days. In addition, when the notifiers exist in Verizon's systems, Verizon reflows the requested notifiers within three business days. This may occur if there are connectivity problems between Verizon and the CLEC, if the CLEC has experienced problems with its own OSS, or simply as a matter of timing, if the notifier is created between the time the CLEC identifies it as "missing" and Verizon investigates.

11. Since the inception of the PON Exception process under the supervision of the New York PSC and the FCC in early 2000, Verizon has consistently performed this function in a timely manner. Verizon has followed this process in working with WorldCom and other CLECs since its introduction in New York in February 2000. Verizon has subsequently rolled-out this process throughout the former Bell Atlantic service areas. Over time, this process has become a method by which CLECs report and track not only "missing" notifiers, but also the timeliness of the completion of the underlying business events, such as provisioning and billing. This is an extension beyond the intent of this specific process. Therefore, it is unlikely that there will be a month in which Verizon receives no trouble tickets for missing notifiers.

12. As the following table demonstrates, CLEC complaints of missing notifiers have been decreasing consistently in New York, even as order volumes have risen.

Month	Number of Trouble Tickets	Number of PONs on Trouble Tickets	Total PONs Submitted in New York	Percentage of Trouble Ticket PONs vs Total PONs
March 2000	164	35,213	451,142	8%
April 2000	218	28,187	386,181	7%
May 2000	206	14,089	386,903	4%
June 2000	152	7,473	375,093	2%
July 2000	118	8,092	397,740	2%
August 2000	147	13,929	441,686	3%
September 2000	133	13,453	432,330	3%
October 2000	156	13,012	495,232	3%
November 2000	121	7,129	457,536	2%
December 2000	103	3,917	479,873	1%
January 2001	91	5,935	503,463	1%

13. As shown above, missing notifiers are reported on 1% of PONs in New York. In Massachusetts, the percentage of missing notifiers is even lower, at 0.02% in January 2001. In Pennsylvania, missing notifiers are reported on about 3% of PONs. All of these are low percentages that are consistent with Verizon's performance as reported in other operational measurements such as confirmation and provisioning timeliness.

14. WorldCom incorrectly contends that Verizon has not identified the "root cause" of those missing notifiers that, upon investigation, are not found in Verizon's systems and reflowed immediately. See WorldCom Br. at 32. As Verizon has explained to WorldCom in the daily and weekly calls concerning notifiers, there is no single root cause. Instead, these situations must be, and are, investigated and resolved on a PON-by-PON basis. In most cases, some action is required by either Verizon or the CLEC to move the PON further in the business process. Example of actions that CLECs must take are the submission of supplemental orders in response to queries to resolve order errors,

rescheduling of customer appointments in response to jeopardies when service calls were made but access to the premises was not provided, or the cancellation of the order. Examples of actions that Verizon must take include the resolution of post-completion discrepancies to update the billing system and subsequently generate a billing completion notifier, or manual work to enter an order into the service order processor to produce a local service confirmation. If, in performing its PON-by-PON investigations, Verizon detects a circumstance that can be improved by changes to systems or processes, these are identified, scheduled, implemented, and communicated as appropriate to the CLECs.

15. WorldCom complains that, as of January 22, 2001 it was missing 1,153 provisioning completion notices and 933 billing completion notices in New York, some of which date back as far as June 2000. See WorldCom Br. at 31; Lichtenberg/Chapman Decl. ¶ 5. WorldCom's statistics are wrong. Verizon has been actively working to resolve each and every PON and to gain WorldCom's concurrence to close each PON. Verizon communicates the status of these PONs to WorldCom on a weekly status call and on daily calls as needed. Verizon's records indicate 339 open PONs awaiting provisioning completion notifiers and 99 open PONs awaiting billing completion notifiers for WorldCom in New York, none of which is older than January 2001.

16. WorldCom also complains about numerous missing notifiers in Pennsylvania. See WorldCom Br. at 31. Many of the billing completion notifiers that WorldCom describes as "missing" were not yet due for such a notifier because the PON had not progressed to the stage where the billing system is updated. Indeed, of the 5,574 missing billing completion notifiers WorldCom discusses, it submitted 4,188 of them on a single trouble ticket on February 2, 2001, just four days before it submitted its

comments in this proceeding. About half of those 4,188 PONs, however, were not due for a billing completion notifier. Verizon has now sent the requested notifier to WorldCom for all but 297 of these PONs. Verizon is continuing to investigate the corrective action required to resolve the remaining PONs.

December EDI Release

17. WorldCom raises yet another complaint arising out of Pennsylvania. WorldCom complains that Verizon's December EDI release contained an error that resulted in rejection of "hundreds of orders." WorldCom Br. at 30; Lichtenberg/Chapman Decl. ¶ 14. The orders were rejected, however, because WorldCom did not submit them appropriately. In December 2000, Verizon implemented a project designed to improve flow through. CLECs were notified of this change through Change Management on November 22 (CR #1783). The bulletin and the impending changes were discussed with the CLECs at the regular weekly meeting where all bulletins and impending changes are reviewed prior to implementation. Pursuant to this change in procedures, and as discussed with the CLECs, as of December 17, CLECs were to include two data elements (USOC and FID) instead of just the USOC when ordering Caller ID. On January 3, 2001, two weeks after the release went into production, WorldCom opened a trouble ticket reporting that Verizon rejected its Pennsylvania transactions when WorldCom did not populate the FID associated with the Caller ID USOC. To resolve the issue, Verizon relaxed the edit on January 10, 2001 and orders submitted without a FID are no longer rejected but instead are directed to the TISOC for manual processing. WorldCom was the only CLEC that opened a trouble ticket for this issue, which has now been resolved, as it admits. See Lichtenberg/Chapman Decl. ¶ 14.

Jeopardy Notifications

18. As we explained in our initial declaration, Verizon provides CLECs with access to the same order status information to which Verizon retail representatives have access. See McLean/Wierzbicki Decl. ¶ 71. Three times each day, Verizon makes the Open Query System ("OQS") reports available to the CLECs. These reports show orders that have been completed, orders in a jeopardy status for Verizon reasons, and orders in a jeopardy status for subscriber reasons. If a CLEC desires further information, it can check the order status in SOP or the installation status from WFA using its pre-order interface. In addition, the CLEC can call the TISOC or Regional Maintenance Center (for provisioning or maintenance, respectively).

19. WorldCom states that it was unable to obtain the OQS jeopardy reports for periods in December and January due to unspecified "systems problems on Verizon's side." Lichtenberg/Chapman Decl. ¶ 20.

20. In investigating WorldCom's claim, Verizon did uncover a system problem. The information that is sent from the backend OSS and that is used to format the OQS reports was functioning only intermittently during the time period that WorldCom references. Verizon is working to identify the specific system problem and the necessary fix. Until a system fix is implemented, the formatting information is being generated manually and sent to the FTP server where WorldCom retrieves its reports.

21. WorldCom also complains that jeopardy notifications it receives over the EDI interface only include jeopardies for which LSOG 2 or LSOG 4 contains corresponding codes. See WorldCom Br. at 32-33; Lichtenberg/Chapman Decl. ¶¶ 17-20.

22. In October 2000, Verizon made available an Electronic Jeopardy Notification through the EDI interface. See McLean/Wierzbicki Decl. ¶ 73. As CLECs were informed through Change Management, Verizon implemented the Electronic Jeopardy Notification in accordance with the Ordering and Billing Forum ("OBF") industry guidelines for Electronic Jeopardy Notifications that was introduced with LSOG 4. Several CLECs, such as WorldCom, informed Verizon that they wanted to take advantage of this functionality even though they had not yet implemented the LSOG 4 version of the industry guidelines. Verizon accommodated these CLECs by implementing a method for CLECs using LSOG 2 to receive an Electronic Jeopardy Notification also.

23. WorldCom claims that it would be "eas[y]" for Verizon to add additional jeopardy notification codes to LSOG 2 and LSOG 4. WorldCom Br. at 33. WorldCom has two forums in which it can raise its desired changes or enhancements – the Verizon Change Management process, for a Verizon-specific implementation, and the OBF, for an expansion of the industry guidelines. Verizon and the CLECs could then evaluate WorldCom's proposal. Further, Verizon has suggested that WorldCom implement LSOG 4 in New York, as it has in Pennsylvania, in order to take full advantage of the functionality introduced with that version.

24. In any event, and as noted above, the OQS reports and other means of accessing order status information are precisely the same as the methods available to Verizon's retail service representatives. For that reason, the Commission concluded that Verizon "makes order status and 'jeopardy' information . . . available to competing carriers in a nondiscriminatory manner," because "competing carries [can] access order

status and 'jeopardy' information, to the extent that it is available, in substantially the same time and manner as [Verizon's] retail operations can access such information." Application by Bell Atlantic New York for Authorization Under Section 271 of the Communications Act To Provide In-Region, InterLATA Service in the State of New York, Memorandum Opinion and Order, 15 FCC Rcd 3953, ¶¶ 184-185 (1999); see also id. ¶ 185 ("the standard sought in this instance is *nondiscriminatory access* . . . . [W]e do not require [Verizon] to establish a system for creating and delivering jeopardy notifications to competing carriers that is superior to the system [Verizon] has for its own retail representatives or customers." (emphasis in original)).

expressTRAK

25. WorldCom repeats earlier claims that Verizon has not provided all of the necessary documentation related to expressTRAK, a new billing OSS. See WorldCom Br. at 30; Lichtenberg/Chapman Decl. ¶ 15.

26. As we noted previously, WorldCom made these same arguments to the Massachusetts DTE, which noted (as WorldCom admits) that expressTRAK is a "back-end" system and is therefore not subject to the same business rule and specification requirements as apply to interface software releases. See McLean/Wierzbicki Rep. Decl. ¶ 37.

27. Even though Verizon is therefore not required to provide CLECs with the same information regarding expressTRAK that it provides for CLEC interface software releases, Verizon has provided CLECs with substantial documentation related to expressTRAK through the change management procedure. See id. Specifically, in July 2000, Verizon provided the following documents to CLECs: expressTRAK CLEC

Specifications, expressTRAK Consumer Resale Bill Sample, expressTRAK Business Resale Bill Sample, and expressTRAK UNE Bill Sample. See Attachment A. Verizon provided further information in October 2000 during a billing collaborative meeting. See Attachment B. In January 2001, Verizon provided CLECs with four additional documents designed to enable CLECs to transfer to expressTRAK when it is rolled out. See Attachment C.

28. Most recently, on February 7, 2001, Verizon provided CLECs with the expressTRAK Guide. See Attachment D. This guide explains the operation of both expressTRAK (classic) and expressTRAK x.5. expressTRAK (classic) replaces Verizon's existing billing legacy systems. expressTRAK x.5 provides CLECs with many of the advantages that expressTRAK (classic) provides by leveraging, rather than replacing, Verizon's legacy systems. At the current time, there is no plan in place to implement expressTRAK (classic) in Massachusetts in 2001. In November 2000, Verizon discussed plans with CLECs to roll out expressTRAK x.5 in Massachusetts as part of the change management process and, pursuant to that process, expressTRAK x.5 became available to Massachusetts CLECs in February 2000.

Documentation Accuracy

29. WorldCom and ASCENT continue to criticize the accuracy of Verizon's documentation. See WorldCom Br. at 30; Lichtenberg/Chapman Decl. ¶ 13; ASCENT at 20. As we have explained previously, the errors in the documentation they refer to amount to less than 1% of thousands of attributes. See McLean/Wierzbicki Decl. Att. U; McLean/Wierzbicki Rep. Decl. ¶¶ 43-44. Verizon's June and October 2000 releases

have been even more accurate, with error rates of 0.4% and 0.13%, respectively. See Attachment E.

30. This concludes our Supplemental Reply Declaration.

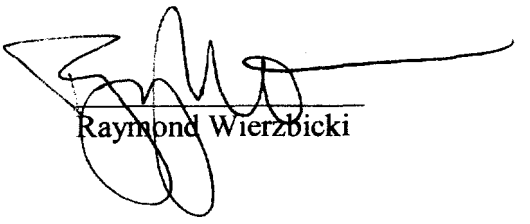
I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed on February 27, 2001

Kathleen McLean

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed on February 27, 2001



Raymond Wierzbicki